



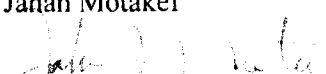
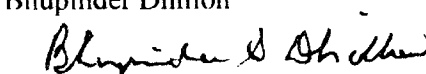
**Negotiated Work Plan
July 1, 2006 through June 30, 2008**

**Riverside County Pesticide Regulatory Program
by
Department of Pesticide Regulation
&
Riverside County Agricultural Commissioner's Office**

Riverside County Agricultural Commissioner's Office

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RIVERSIDE COUNTY PESTICIDE USE ENFORCEMENT WORK PLAN

Fiscal Years 2006/07 and 2007/08

The Riverside County Agricultural Commissioner's Pesticide Use Enforcement Work Plan has been developed using the California Department Pesticide Regulation (CDPR) Enforcement Letter ENF 04-23, Pesticide Use Enforcement Program Planning and Evaluation Guidance – October 2004 through 2006. This document was used as a guidance to effectively target core program priorities and to evaluate the pesticide use enforcement program within Riverside County. This document allowed the Agricultural Commissioner to effectively analyze what resources are available to focus on the core enforcement program in order to assure a high level of compliance by the regulated community regarding pesticide laws and regulations.

The core enforcement program covers the following the elements:

- Restricted materials permitting
- Compliance monitoring
- Enforcement response

The Riverside County Agricultural Commissioner's Office has 4 District offices in 4 different regions of Riverside County – Riverside/Corona District, San Jacinto District, Coachella Valley District, Palo Verde Valley District. Within each of these districts, Agricultural & Standards Investigators (ASI) have multiple responsibilities, including PUE. In the Riverside/Corona District, 2 ASIs spend about 90% to 95% of their time on PUE activities; in the San Jacinto District, there is one ASI that spends about 70% to 80% of the time on PUE activities, and is assisted by an ASI that spends about 15% to 25% of the time on PUE activities; in the Coachella Valley District, there are 2 ASIs that spend about 90% to 95% of their time on PUE activities, and are assisted by an ASI that spends about 15% to 25% of the time on PUE activities; in the Palo Verde Valley District, there is one ASI that is responsible for all of the Agricultural Commissioner's office duties in that district, and spends about 25% to 50% of the time on PUE activities.

Approximately 17,000 hours were devoted to pesticide use enforcement activities in FY 2004/05, consisting of approximately 12,500 hours for ASI and Deputy activities (this equates to approximately 6 full time staff) and 4,500 hours for clerical support activities. In FY 2004/05, there was approximately a reduction of 10% in ASI staffing hours due to two vacancies that were created when promotions occurred. In FY 2005/06, there was approximately a reduction of 17% in ASI staffing hours, when compared to FY 2004/05, due to unfilled vacancies, and the fact that PUE staff also worked in other inspection programs that were conducted by the Riverside County Agricultural Commissioner's Office. In Fiscal Year 2006/07, it is anticipated that staffing resources for ASI PUE

activities will be approximately 10% less than in FY 2005/06, due to unfilled ASI positions. All hours expended on pesticide regulatory activities are reported on the Pesticide Regulatory Activities Monthly Report (PRAMR).

Agricultural & Standards Investigators use county supplied vehicles to conduct their work, and communication is primarily through the use of personal cell phones. Each District office has a computer station for ASI use so that they may receive and send email and have access to CDPR enforcement letters and other information on line. Each computer station is also used by ASIs to issue Restricted Materials Permits.

The core enforcement program, by the element, is listed below with the anticipated staffing hours for FY 2006/07 and FY 2007/08:

		<u>2006/07</u>	<u>2007/08</u>
• Restricted Materials Permitting	–	2,400 hours	2,400 hours
• Compliance Monitoring	--	5,400 hours	5,400 hours
• Enforcement Response	--	700 hours	700 hours
• Supervision/Management	--	2,000 hours	2,000 hours
• Support Hours	--	3,500 hours	3,500 hours
	Totals	(14,000 hours)	(14,000 hours)

A. RESTRICTED MATERIALS PERMITTING

Annual evaluations conducted by CDPR of Riverside County's restricting materials permitting program have found that the program meets the requirements of CDPR, including issuing restricted materials according to the California Food and Agricultural Code and California Code of Regulations, with no corrective actions necessary. The self-evaluation of the restricted materials permitting program by the Riverside County Agricultural Commissioner's Office also found that restricted materials are issued according to pertinent California laws and regulations. However, during the self-evaluation in FY 2004/05, it was noted that Riverside County has 4 District offices and each District may not issue restricted materials permits in exactly the same way due to unique situations and conditions present in each District. An example of an item that was not uniform was permit conditions for the use of metam sodium were slightly different in each District. In FY 2004/05, corrective actions were taken to achieve uniformity in all 4 Districts during the restricted materials permit issuance process, while still allowing for flexibility by each District to issue restricted materials permits based on local concerns. This flexibility is needed due to the fact that each District has unique circumstances that need to be addressed on a local basis. This uniformity in the

restricted materials permit issuance process continued in FY 2005/06, and the goal is to continue this uniformity in FY 2006/07 and FY 2007/08.

Deliverables:

To achieve and maintain uniformity in the Restricted Materials Permit (RMP) issuance process, the Deputy will have a meeting with the PUE staff to assure that all personnel are aware of what items need to be issued during the RMP issuance process. During this meeting it will also be explained that each District can address their local concerns when the RMP is issued, but to make sure that the Deputy is aware of local District RMP conditions of use. In addition, the Deputy will visit each District during the time that RMPs are issued to make sure that RMPs are being issued consistently in all 4 Districts.

Restricted Materials Permit Evaluation – Process Evaluation and Improvement Planning

Riverside County Permits (approximate #)

* Agricultural Annual	300
* Agricultural Multi-Year	450
* Non-agricultural	<u>125</u>
Total	875

Approximately 35% of the Restricted Materials Permits issued by Riverside County are for annual production agricultural use situations and are generally issued to the same permittee each year. For these permits, in general, the permittee is issued a permit for the same pesticides for use on the same crops and sites. Agricultural & Standards Investigators (ASIs) review each application for a permit, as well as each site on the permit application, and condition the permit as necessary following CDPR protocol and Riverside County conditions of use.

Agricultural & Standards Investigator's responsibilities for each permittee:

- Issue Restricted Materials Permit
- Review and evaluate each Notice of Intent received
- Pre-application site inspection for restricted pesticide use, as necessary
- Mix/load and application inspections of pesticide use
- Field Worker safety inspections
- Employer Headquarter inspections

Procedure for issuance of Annual Permits:

October

A letter is sent to permittees to inform them that they need to renew their restricted materials permit for the next calendar year, what items are required for renewing the permit, and that an appointment is necessary to do so.

November

- Current permittees begin making appointments to renew their annual permits. Current permits are reviewed by ASIs and discussed with the permittee and new information is supplied by permittee via an application.
- The permit application is reviewed and evaluated, based on the most current version of the Restricted Materials and Permitting Manual, and if approved, the permit will be issued.
- Records of permittee are evaluated to determine past compliance issues that need to be addressed prior to issuance of new permit.
- Each site on the permit is evaluated and conditioned accordingly.
- Changes to permits are entered in the computer by the issuing ASI.
- As necessary, the Private Applicators Exam is given to permit applicants.
- During the issuance process, information packets are given to and discussed with each permittee.

Procedure for Issuance of Multi-year Permits:

Multi-year permits are issued to cities, golf courses, growers with “permanent” crops such as citrus and grapes. These permits are issued for a period of up to 3 years; the expiration date of the Restricted Materials Permit is based on the expiration date of the certificate or license issued to the Certified Private Applicator, Qualified Applicator Certificate holder or Qualified Applicator Licensee. The procedure for issuing multi-year permits is the same as for annual permits.

When an application for a restricted materials permit is received, the application is evaluated, the site is inspected, and if appropriate, the permit is conditioned and issued. The most current version of the Restricted Materials and Permitting Manual is followed during the restricted materials permit issuance process.

In addition to the 875 Restricted Materials Permits, Riverside County has approximately:

- 385 Operator Identification Numbers
- 260 Agricultural Pest Control Businesses registered annually
- 60 Maintenance Gardeners registered annually
- 525 Structural Pest Control Operator notifications annually
- 110 Agricultural Pest Control Advisers registered annually
- 55 Farm Labor Contractors registered annually
- 40 Pilots registered annually
- 3,000 Notices of Intent reviewed annually
- 7,000 Structural Notices of Intent

Site Monitoring Plan

The existing site monitoring plan for Riverside County has been successful for many years. Approximately 3,000 Notices of Intent (NOI) are received by Riverside County each year. Each NOI is reviewed according to the California Code of Regulations. High priority is given to the most toxic restricted materials and sites within sensitive areas.

This same high priority for site monitoring is also given to other pesticides of a lesser toxicity that have a history of non-compliances or complaints associated with them.

Each of the 4 Districts within Riverside County has their own unique circumstances and high priority situations that are addressed during the Restricted Materials Permit issuance and NOI review process. High priority is given to field fumigants, cotton defoliant, phenoxy herbicides, and a plant growth regulator, Dormex (used on grapes in the Coachella Valley), and Malathion Dust (used on dates in the Coachella Valley).

Deliverables:

The following is a list of the pesticides receiving high priority monitoring in Riverside County. The crops listed are on what each of the respective pesticides are most commonly used; the acreages listed are approximate.

- Field Fumigants

- Metam Sodium/Potassium (Used Summer, Fall)

- * Coachella Valley District – peppers (1,500 acres), melons (700 acres);
 - miscellaneous vegetables (1,100 acres), uncultivated ag. (700 acres)

- ** For Metam Sodium/Potassium, Riverside County is performing pre-application site inspections for all proposed sprinkler applications due to the potential off-gassing of these pesticides. All handlers of these pesticides are required to attend a Stewardship Training class offered by the manufacturer. Riverside County ASI PUE staff also attends to review permit and use conditions with permittees and handlers. A 48 Hour Notice of Intent is required. In the San Jacinto and Riverside Districts, a job permit is required whenever these pesticides are requested to be used.

- Methyl Bromide (Fall, Spring)

- * Coachella Valley District – miscellaneous vegetables (600 acres),

- * Riverside District – strawberry (3 acres);

- * San Jacinto District – strawberry (5 acres), turf (5 acres).

- ** Whenever this pesticide is requested for use, the requirements listed in CCR 6450 are followed.

- 1,3 – Dichloropropene (Fall, Spring)

- * Coachella Valley District – peppers, miscellaneous vegetables (400 acres);
- * San Jacinto District -- strawberry, potatoes (100 acres).
- ** Job permits are required for the use of this pesticide. 100% pre-application site inspections are done.

- Cotton Defoliant – Palo Verde Valley District

- Thidiazuron – 4,000 acres
- Tribufos – 5,000 acres
- Paraquat – 100 acres

** Tribufos and Paraquat are restricted materials. NOIs are reviewed and priority for pre-application site inspections is given to those areas near sensitive sites and residential areas. CCR 6470 is followed.

** Even though Thidiazuron is not a restricted material, due to past problems (damage to lettuce from either drift or contaminated application equipment), Riverside County is requiring that it be listed on the restricted materials permit and that a 24 hour Notice of Intent be submitted so the proposed site of application can be evaluated according to label requirements and permit conditions. Pre-application site inspections will be conducted on at least 5% of these proposed application sites, with sites within ½ mile of lettuce receiving 100% pre-application site inspections.

- Dormex – Coachella Valley District

- use on table grapes in December & January (8,000 acres).

** An extensive site monitoring program is conducted each year by Riverside County. This is because of the potential damage Dormex can do to lemons. All handlers of this pesticide are required to attend a Stewardship Training class offered by the manufacturer. Riverside County ASI PUE staff also attend to review permit and use conditions with the permittees and handlers. In addition, prior to the use season, ASI staff will inspect the application and mix/load equipment to make sure that all requirements as listed on the Dormex label and in the permit conditions are in compliance. This is being done to reduce any problems during the use season of Dormex. A 72 hour Notice of Intent is required. Each NOI is reviewed to ensure that all permit conditions are being complied with. Pre-application site inspections are done on each proposed site of application, especially those are near sensitive sites, as listed on the permit. Extensive monitoring of the use of Dormex is conducted by ASI personnel, including at night and on weekends, to ensure that all permit conditions and label requirements are being complied with by the permittee and applicator.

- Phenoxy Herbicides (2,4-D)
 - * Palo Verde Valley District – wheat (1,000 acres)
 - * San Jacinto District – wheat (2,500 acres)
 - * Riverside District – wheat (1,500 acres)
 - ** 100% of the NOIs are reviewed to ensure that all permit conditions are being complied with by the permittee. Pre-application and application inspections are done on the most sensitive sites as shown on the restricted materials permit.
- Malathion Dust – Coachella Valley District
 - *use on dates in July through early October (~ 3,000 acres); an extensive site monitoring program will be conducted by Riverside County. This is because of the potential off-site movement of the dust pesticide, especially to sensitive sites, such as homes, schools, field workers, etc. All pesticide handlers are required to attend a Stewardship Training class offered by the manufacturer and Riverside County Agricultural Commissioner prior to use. ASI PUE staff will inspect the application equipment prior to the use season to make sure that all equipment is working properly before Malathion Dust is applied and to reduce problems during the use season of Malathion Dust. A 24 hour Notice of Intent is required. Each NOI is reviewed to ensure that all permit conditions are being complied with. Pre- application site inspections are done on each proposed site of application, especially those near sensitive sites, as listed on the permit. Monitoring is done by ASI PUE staff, including at night and on weekends, to ensure that all permit conditions and label requirements are being complied with by the permittee and applicator.

For each of these pesticides, there are potential hazards associated with them, especially in an agricultural/urban setting. Consequently, the Agricultural Commissioner's Office will dedicate the necessary resources to monitor the use of these pesticides to ensure that these pesticides are used safely at the site being treated. The monitoring done by the Agricultural Commissioner will assure compliance with all applicable laws, regulations, and permit conditions in an effort to protect the public, workers, and the environment.

B. COMPLIANCE MONITORING ELEMENT

The annual evaluations done by CDPR of Riverside County's compliance monitoring program have found that the compliance monitoring element of the PUE program to be acceptable and within the requirements of CDPR. The self-evaluation done by Riverside County of the current compliance monitoring component found that the

PUE program meets all of the requirements of CDPR, including proper enforcement of applicable laws and regulations. However, during this self-evaluation it was found that the following areas may need improvement and efforts have been implemented to improve in these areas. The following is a list of these areas that improved during Fiscal Year 2005/06, but will continue to be monitored during Fiscal Year 2006/07 and Fiscal Year 2007/08. The way this improvement will be monitored is proposed as the following (“deliverables”):

- Complete inspection forms need to be thorough and accurate. (Deliverable = ASI following the CDPR Inspection Procedures Manual and review of forms by ASI prior to submittal to Deputy with the PRAMR. Review of forms by Deputy and letting the ASI know what corrections need to be made).
- Provide training to ASI staff to ensure that they are knowledgeable about the proper way to complete inspection forms. (Deliverable = Deputy meeting with ASIs to let them know what is expected by DPR; making sure that ASIs follow the CDPR Inspection Procedures Manual. Training by CDPR Enforcement Branch Liaison).
- Provide training to ASI staff to assure they know of proper procedures and techniques to conduct investigations and write investigation reports. (Deliverable = Training by CDPR; assuring ASIs follow the investigative procedures and report writing procedures as required by CDPR, during Fiscal Years 2006/07 and 2007/08).
- Communication between ASI staff and the Deputy. (Deliverable = Interaction of Deputy with ASI staff in the field; ASI following “communication chain of command”; quarterly meetings between ASIs and Deputy).
- Monitoring of Structural Pest Control Operators needs to increase. (This depends on priorities and other workload concerns that evolve throughout the year. In addition, this is greatly dependent upon the amount of staff available to conduct these inspections – a constraint of the budget).
- Compliance, over-all, is improving. However, gaining the compliance of growers, agricultural pest control businesses, structural pest control companies, and others with a history of non-compliance is a priority. This will be accomplished with increased education and outreach, and increasing inspection levels as necessary. Outreach is accomplished by having individual and group meetings with the various regulated industries, letting them know how to comply with California laws and regulations and local Riverside County pesticide use conditions. Information about various websites is also given to persons or groups during these meetings, including CDPR, CDFA and the University of California Cooperative Extension in an effort to increase compliance.

Also, as needed, enforcement action fines will be increased, compliance interviews will be held, and if necessary, cases will be referred to the District Attorney.

Priority of Inspections

Following are the highest priority inspections and investigations in Riverside County and the plan to accomplish these activities:

- **Illness & Complaint Investigations – 35 to 50 per year**
There are approximately 20 human illness investigations that Riverside County investigates each year. In addition, a variety of complaints are received each year, ranging from damage to crops caused by drift or contaminated application equipment, people complaining about pesticide misuse by their neighbor, complaints from the complaint that they or their property got drifted on by an applicator (aerial, structural), pets that become ill from pesticides applied on or near a homeowner's property. Each illness and complaint is investigated properly, as stated below. To conduct these investigations, we will follow the procedures outlined in the most current edition of the Pesticide Episode Investigation Procedures Manual. We will ask for assistance from CDPR as necessary so the investigation will be completed in a timely manner. Also, we have asked CDPR for additional training of ASIs so we are knowledgeable of the proper investigation procedures.
- **Priority Investigations – as needed**
We will conduct these investigations according to the procedures outlined in the most current edition of the Pesticide Episode Investigation Procedures Manual. We will ask for assistance from CDPR as necessary so the investigation will be completed within 60 days of initiation. CDPR will be updated with 15 day progress reports. Additional training has been requested of CDPR so that we obtain and maintain knowledgeable of the most current and required procedures for these types of investigations.
- **Field Fumigations – approximately 20 to 30 field inspections, with 100% pre-application site inspections (approximately 125 to 150) proposed.** The goal is to conduct 100% pre-application site inspections of all proposed applications; this allows us to ensure that field fumigations will occur only according to permit conditions. We provide outreach to growers and Pest Control Operators (PCOs) and their employees so that they are aware of the permit conditions and other requirements when field fumigants such as Metam Sodium and Methyl Bromide are used. All Pest Control Advisers, permittees and their handler employees are required to attend mandatory stewardship training when Metam Sodium/Potassium Sodium products are proposed to be used.

- Dormex inspections – Dormex is a plant growth regulator used on grapes in the Coachella Valley. It has a history of moving off-site and damaging lemons. A mandatory stewardship program is conducted by the Dormex Company and the Riverside County Agricultural Commissioner's Office. Monitoring by the Agricultural Commissioner is done day and night, 7 days a week, during the usage period in December and January to ensure that Dormex is being handled and applied safely. Staff from the other three Districts will assist the Coachella Valley District as needed.
- Malathion Dust – Malathion Dust is an insecticide that is used on dates in the Coachella Valley for control of Carob Moth. With the increasing ag/urban interface occurring in the Coachella Valley, the use of Malathion Dust has become increasingly difficult. The Riverside County Agricultural Commissioner's Office will conduct 100% pre-application site inspections (approximately 150 to 200 proposed); this will allow us to ensure that Malathion Dust applications will occur only according to permit conditions. In addition, all growers, pest control operators, permittees and their employee handlers are required to attend a mandatory stewardship training before Malathion Dust may be used.
- Cotton Defoliant – in the Palo Verde Valley, the cotton defoliant DEF, Folex, Paraquat and Dropp are applied by growers and PCOs. Inspection and monitoring will be done by the Agricultural Commissioner to assure that these defoliant are applied as per label requirements, the California Code of Regulations, and permit conditions.

The following is an estimated number of the types of inspections that Riverside County will conduct for Fiscal Year 2006/2007 and Fiscal Year 2007/08. These inspections and the estimated numbers of each are used as a tool to assist Riverside County in accomplishing the goals stated above. Adjustments to the individual numbers may need to be made as the Fiscal Year progresses and the work plan is assessed.

FY 2006/07 and 2007/08

I. Completed Investigations (Human Effects, Environmental Effects, Property Loss Damage, Other)		100 %
II. Application Inspections (Non-Fumigation)		256
Property Operator (e.g. grower, government) -	90	
Pest Control Business (agric., maintenance gardener) -	92	
Structural (Application & Mix/Load)		
Branch 2	47	
Branch 3	7	
III. Field Worker Safety Inspections		58
IV. Mix/Load Inspections		118
Property Operator -	52	
Pest Control Business -	45	

Structural Branch 2 -	16	
Structural Branch 3 -	5	
V. Fumigation Monitoring (Inspection + Equipment)		96
Field -	22	
Commodity -	16	
Structural Branch 1 – Application/Aeration –	58	
VI. Headquarters/ Employee Safety Inspections		147
Production Ag./Other –	95	
Pest Control Business –	24	
Structural Pest Control Business –	28	
VII. Permit Monitoring		
Pre-Site Evaluations – 5%		
Non-Agric. Permit – 100%		
VIII. Pest Control Business Records Inspections		32
IX. Structural Pest Control Business Records Inspections		28
X. Pest Control Dealer Inspections		13
XI. Agricultural Pest Control Advisor Record Inspections		14
Total Compliance Monitoring Inspections (does not include item VII)		762

C. ENFORCEMENT RESPONSE

The annual evaluation by CDPR of Riverside County's enforcement program has consistently found that the program meets the requirements of CDPR, including the appropriate and proper application of laws and regulations. The program has been found to be acceptable by CDPR and it has been determined that no corrective actions are needed. The self-evaluation of the current enforcement response system has found that the requirements of CDPR are being met by Riverside County, including the proper application of laws and regulations. The enforcement response program in Riverside County has been in place for a number of years and has been applied on a consistent basis. This has provided Riverside County with a sound basis for its enforcement response program and has resulted in appropriate enforcement actions being taken on consistent basis.

Since FY 2003/04, Riverside County has experienced a staffing shortage in PUE personnel. As a result, in our enforcement response, we have concentrated more on non-compliances that have a more direct impact on health, safety of the handler, the public and the environment, such as: conducting inspections on pesticides with the signal word "Danger"; conducting inspections on pesticides that have a history of drifting and causing damage to surrounding crops (2,4-D);

pesticides that have a history of off-gassing and causing damage to other crops, such as lemons (Dormex), or adversely affecting the surrounding public because of improper application (Vapam); Methyl Bromide use inspections have been increased because of the increased scrutiny and regulation of this pesticide. In addition, the re-entry interval requirements after pesticide use as noted on the pesticide label and in the California Code of Regulations, as well as the need for decontamination facilities and Hazard Communication for fieldworkers is thoroughly covered with permittees during the RMP process and with Farm Labor Contractors during the registration period in attempt to avert illness to farm workers.

The enforcement response of Riverside County is made up of the following elements:

- The Enforcement Response Policy is followed when considering an enforcement response.
- After the discovery of a non-compliance, the ASI schedules a follow-up inspection, if possible, to make sure that all non-compliances have been corrected.
- The Deputy Commissioner discusses the non-compliances and circumstances with the individual ASI to obtain necessary information.
- The Deputy Commissioner, along with the lead PUE ASI, considers the non-compliances noted by the ASI. The Enforcement Response Policy guidelines are used to determine the appropriate level of enforcement to take.
- Each time a non-compliance is noted by an ASI, one of the following actions is always taken to document the non-compliance: a Verbal Warning, a Letter of Warning or Notice of Violation is issued.
- If it is determined that an enforcement action needs to be taken, then a Notice of Proposed Action is developed and sent by certified mail to the respondent.
- History of each person or company with a non-compliance is kept and tracked so that appropriate enforcement actions are taken. Enforcement actions are also tracked to ensure that they are completed in a timely manner, as per the enforcement guidelines.
- In Fiscal Year 2005/06, a letter was sent from the Structural Pest Control Board (SPCB) to the California Department of Pesticide Regulation expressing concern about the length of time taken by Riverside County to issue a Notice of Proposed Action (NOPA) after a violation happens. According to this letter, in Riverside County, the average length of time between the date of incident (violation) and the date the NOPA was issued was 327 days.

During Fiscal Year 2005/06, for incidents involving violations committed by a structural pest control company or their employees, Riverside County

issued a NOPA within 2 months of the date of the violation, and the goal is to continue this practice during Fiscal Years 2006/07 and 2007/08.

During Fiscal Year 2005/06, for incidents involving violations committed by an agricultural pest control business, agricultural pilot, pest control adviser, Qualified Applicator Licensee, etc., Riverside County issued a NOPA within 4 months of the date of the violation, and the goal is to continue this practice during Fiscal Years 2006/07 and 2007/08.

RIVERSIDE COUNTY PESTICIDE USE ENFORCEMENT WORK PLAN

FISCAL YEARS 2006/07/ and 2007/08

AMENDMENT to PART C – ENFORCEMENT RESPONSE

In late September 2007, the person responsible for preparing the Notices of Proposed Action (NOPA) retired. Due to this retirement, Notices of Proposed Action may not be issued according to the timeframes listed in “PART C – ENFORCEMENT RESPONSE”; however, Notices of Proposed Action will be issued within the respective legal statute of limitations for Structural Civil Penalties and Agricultural Civil Penalties.

The goal is to issue Notices of Proposed Action according to the timeframes listed in “PART C – ENFORCEMENT RESPONSE”. In order to achieve this goal, additional personnel will have to be trained to issue Notices of Proposed Action.